

# EXHIBIT A

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June 29, 2023

Lauren M. Rosenberg  
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Worldwide Plaza, 825 Eighth Avenue  
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VIA EMAIL  
lrosenberg@cravath.com

Re: *In re: Anadarko Petroleum Corp. Sec. Litig.*, No. 4:20-cv-00576 (S.D. Tex.)

Dear Lauren:

We read with interest Defendants' June 27, 2023 letter to the Court (ECF 197), specifically the denial of any intention to delay the Court's March 31, 2023 Order (ECF 173) ("MTC Order"). It's been Plaintiffs' position all along that Defendants' motion for reconsideration does not stay the MTC Order, so we are pleased to hear that Defendants' compliance can proceed without further delay.

As previously discussed, the MTC Order granted Plaintiffs' motion to compel in full, finding "waiver extend[ing] to the entire subject matter of the AAC investigation." MTC Order at 9. The Court did not carve out legal advice or opinion work product from the subject-matter waiver. Accordingly, Plaintiffs disagree with Defendants' attempt to so limit the MTC Order. Unless Defendants are willing to reconsider their position, it appears the parties have reached impasse on this issue.

Further, your April 28, 2023 meet-and-confer letter made a representation that:

We are conducting additional review of the documents at issue to determine which documents listed on Exhibit I and the privilege logs of the Audit Committee members, as well as the documents KPMG redacted for Anadarko work product, contain factual information learned during Norton Rose's privileged investigation and thus fall within the scope of the Order.

Rosenberg 4/28/23 letter at 2.

That was two months ago, and we never heard back from you. Within one week, on or by July 6, 2023, please provide us with: (i) the quantity of documents identified; (ii) the universe of documents searched; (iii) whether Defendants agree to produce the documents identified and by what date certain; and (iv) if Defendants refuse to produce these documents, the basis for their refusal.

Very truly yours,

  
RACHEL L. JENSEN

cc: Lauren Phillips (via email)  
Daniel S. Drosman  
Luke O. Brooks

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